

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Felecia N. Harcum	:	Chapter 13
	:	
Debtor	:	Case No.: 17-10177-MDC

MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now, Felecia N. Harcum, hereinafter referred to as "Debtor" and moves this Honorable Court to vacate its September 9, 2019 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about January 10, 2017.
2. The Chapter 13 bankruptcy matter was assigned case number 17-10177.
3. The Chapter 13 Plan was confirmed by this Honorable Court on December 14, 2017.
4. On or about May 6, 2019, Debtor and U.S. Bank entered into a Stipulation, attached hereto as Exhibit "A", wherein Debtor agreed to cure Post-petition arrears.
5. The Debtor made the first payment in April 2019 in the amount of \$1,238.00 and a subsequent payment of \$6,319.52 on September 19, 2019 which was not credited. Proof of payment attached hereto as "Exhibit B."
6. The September 9, 2019 Order was entered subsequent to a Certificate of Default filed on or about August 30, 2019 by U.S. Bank National Association (Trustee for The Pennsylvania Housing Finance Agency), hereinafter referred to as "U.S. Bank."
7. On or about September 9, 2019 this Court entered an Order in favor of U.S. Bank for Relief from the Automatic Stay.

8. Debtor was unable to pay during the months of May through August because she was caring for a family member who was ill but has since recovered.

9. The Debtor is desirous of keeping her real property located at 4065 Ford Road, Philadelphia, Pa 19131 and to that aim will ascertain and pay any and all post-petition delinquencies prior to the hearing on the instant Motion.

WHEREFORE, for the reasons stated herein, the Debtor respectfully request that this Honorable Court Vacate September 9, 2019 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: October 23, 2019

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107